

**U.S. BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re TIMOTHY M. COTTER : CHAPTER 13
MELISSA S. COTTER :
Debtor(s) : BANKRUPTCY NO. 17-13357

OBJECTION TO CERTIFICATION OF DEFAULT

Debtor(s), Timothy M. and Melissa S. Cotter, by their attorney, Paul H. Young, Esquire, hereby objects to the Certification of Default filed by Freedom Mortgage Corporation on November 15, 2023. Debtors believe they can become current on all post-petition payments due under the June 29, 2020 stipulation with the Lender.

Respectfully submitted,

/s/ Paul H. Young
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